

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ZENIMAX MEDIA INC. and ID SOFTWARE LLC

Plaintiffs,

v.

OCULUS VR, LLC, PALMER LUCKEY AND
FACEBOOK, INC.,

Defendants.

Case No.: 3:14-cv-01849-P

**NOTICE OF PRODUCTION OF DISCOVERY SOUGHT BY PLAINTIFFS' PENDING
MOTION TO COMPEL (ECF NO. 121)**

Defendants Oculus VR, LLC ("Oculus"), Palmer Luckey ("Luckey"), and Facebook, Inc. (collectively, "Defendants") respectfully submit this Notice of Production of Discovery Sought by Plaintiffs' Pending Motion to Compel (ECF No. 121). This Notice updates the Court regarding the document and source code productions addressed in Defendants' Motion to Strike Plaintiffs' Reply Memorandum and Appendix or, in the Alternative, Motion for Leave to File Sur-Reply and Brief in Support (ECF No. 149). On May 18, 2015, Defendants produced over 6,100 documents (over 21,000 pages), which included documents responsive to the categories in Plaintiffs' Motion to Compel. This production brought the total number of documents produced by Defendants in this matter to over 27,000 documents (over 81,000 pages). Defendants currently anticipate making another production of documents responsive to the categories in the Motion no later than June 5, 2015. On May 22, 2015, Oculus and Luckey conducted a mutual exchange of source code with Plaintiffs, producing over 700 GB of source code. Additional mutual exchanges of source code are ongoing.

Dated: May 29, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

On May 29, 2015, I hereby certify that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). I hereby certify that I have served all counsel who are deemed to have consented to electronic service or by another manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Heidi L. Keefe
Heidi L. Keefe